IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

EMOJI COMPANY GmbH,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A" HERETO,

Defendants.

Case No.: 20-cv-4720

Judge Sharon Johnson Coleman

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on EMOJI COMPANY GmbH's Motion for a Preliminary Injunction, and this Court having considered the evidence before it hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction in its entirety against the Defendants identified in Schedule A attached hereto (collectively, the "Defendants").

THIS COURT HEREBY FINDS that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants are reaching out to do business with Illinois residents by operating one or more commercial, interactive Internet Stores through which Illinois residents can purchase products bearing infringing and/or counterfeit versions of Plaintiff's EMOJI Trademarks (the "EMOJI Products").

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("TRO") should remain in place through the pendency of this

litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiff's previously granted Motion for a Temporary Restraining Order establishes that Plaintiff has a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted.

Specifically, Plaintiff has made a *prima facie* showing of trademark infringement because (1) the EMOJI Trademarks are distinctive marks and registered with the U.S. Patent and Trademark Office on the Principal Register as U.S. Trademark Registration Nos. 4,868,832; 5,202,078 and 5,415,510 for the EMOJI marks, (2) Defendants are not licensed or authorized to use EMOJI Trademarks, and (3) Defendants' use of the EMOJI Trademarks are causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with EMOJI COMPANY GmbH. Furthermore, Defendants' continued and unauthorized use of the EMOJI Trademarks irreparably harms Plaintiff through diminished goodwill and brand confidence, damage to Plaintiff's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Plaintiff has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions.

Accordingly, this Court orders that:

- 1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be temporarily enjoined and restrained from:
 - a. using Plaintiff's EMOJI Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof in any manner in connection

- with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine EMOJI Products or not authorized by Plaintiff to be sold in connection with Plaintiff's EMOJI Trademarks;
- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine EMOJI Products or other product produced by Plaintiff, that is not Plaintiff's or not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under Plaintiff's EMOJI Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
- d. further infringing Plaintiff's EMOJI Trademarks and damaging Plaintiff's goodwill;
- e. otherwise competing unfairly with Plaintiff in any manner;
- f. shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear Plaintiff's EMOJI Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof;
- g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the Defendant Domain Names, or

- any other domain name or online marketplace account that is being used to sell (now or in the future) Counterfeit EMOJI Products; and
- h. operating and/or hosting websites at the Defendant Domain Names and any other domain names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing Plaintiff's EMOJI Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof that is not a genuine EMOJI Products or not authorized by Plaintiff to be sold in connection with Plaintiff's EMOJI Trademarks.
- 2. Each Defendant, within fourteen (14) days after receiving notice of this Order, shall serve upon Plaintiff a written report under oath providing: (a) their true name and physical address, (b) all websites and online marketplace accounts on any platform that it owns and/or operate (c) their financial accounts, including all eBay and PayPal accounts, and (d) the steps taken by that Defendant to comply with paragraph 1, a through h, above.
- 3. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet, and the Public Interest Registry, within three (3) business days of receipt of this Order or prior to expiration of this Order, whichever date shall occur first, shall, at Plaintiff's choosing:
 - a. unlock and change the registrar of record for the Defendant Domain Names to a registrar of Plaintiff's selection until further ordered by this Court, and the domain name registrars shall take any steps necessary to transfer the Defendant Domain Names to a registrar of Plaintiff's selection until further ordered by this Court; or

- b. disable the Defendant Domain Names and make them inactive and untransferable until further ordered by this Court.
- 4. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as iOffer, eBay and PayPal, Inc. ("PayPal"), social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendant Domain Names, and domain name registrars, shall within three (3) business days of receipt of this Order:
 - a. disable and cease providing services for any accounts through which
 Defendants engage in the sale of counterfeit and infringing goods using the
 EMOJI Trademarks, including any accounts associated with the
 Defendants listed in Schedule A;
 - b. disable and cease displaying any advertisements used by or associated with
 Defendants in connection with the sale of counterfeit and infringing goods
 using the EMOJI Trademarks; and
 - c. take all steps necessary to prevent links to the Defendant Domain Names identified in Schedule A from displaying in search results. This includes, but is not limited to removing links to the Defendant Domain Names from any search index.
- 5. Defendants and any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of Defendants' websites at the Defendant Domain Names or other websites operated by Defendants, including, without limitation, any online marketplace platforms such as iOffer, eBay, PayPal, advertisers, Facebook, Internet Service Providers ("ISP"), web hosts, back-end service providers, web

designers, sponsored search engine or ad-word providers, banks, merchant account providers, including, eBay, PayPal, third party processors and other payment processing service providers, shippers, and domain name registrars (collectively, the "Third Party Providers") shall, within five (5) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

- a. The identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information;
- b. the nature of Defendants' operations and all associated sales and financial information, including, without limitation, identifying information associated with the Online Marketplace Accounts, the Defendant Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplace Accounts and Defendant Domain Names;
- c. Defendants' websites and/or any Online Marketplace Accounts;
- d. The Defendant Domain Names or any domain name registered by Defendants; and
- e. Any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation,

eBay, PayPal, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

- 6. Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 7. eBay shall, within two (2) business days of receipt of this Order, for any Defendant or any of Defendants' Online Marketplace Accounts or websites:
 - a. Locate all accounts and funds connected to Defendants, Defendants' Online
 Marketplace Accounts or Defendants' websites, including, but not limited to, any
 eBay accounts connected to the information listed in Schedule A hereto; and
 - b. Restrain and enjoin any such accounts or funds that are China or Hong Kong based from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 8. PayPal shall, within two (2) business days of receipt of this Order, for any Defendant or any of Defendants' Online Marketplace Accounts or websites:
 - a. Locate all accounts and funds connected to Defendants, Defendants' Online
 Marketplace Accounts or Defendants' websites, including, but not limited to, any
 PayPal accounts connected to the information listed in Schedule A hereto; and
 - b. Restrain and enjoin any such accounts or funds that are China or Hong Kong based from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

9. Plaintiff may provide notice of these proceedings to Defendants, including notice

of any future hearings and service of process pursuant to Fed.R.Civ.P. 4(f)(3), by

electronically publishing a link to the Complaint, this Order and other relevant documents

on a website to which the Defendant Domain Names are transferred to Plaintiff's control

will redirect, or by sending an e-mail to the e-mail addresses identified in Schedule A

hereto; and any e-mail addresses provided for Defendants by third parties accompanied by

a link to the website where the above-identified documents are located. The Clerk of Court

is directed to issue a single original summons in the name of

"2015HONESTMERCHANTS and all other Defendants identified in Complaint"

Schedule A that shall apply to all Defendants. The combination of providing notice via

electronic publication or e-mail, along with any notice that Defendants receive from

domain name registrars and payment processors, shall constitute notice reasonably

calculated under all circumstances to apprise Defendants of the pendency of the action and

afford them the opportunity to present their objections.

10. Plaintiff's Schedule A to the Complaint, and the TRO are unsealed.

11. Any Defendants that are subject to this Order may appear and move to dissolve or modify

the Order on two days' notice to Plaintiff or on shorter notice as set by this Court.

12. Plaintiff shall post a bond with the Court within one week of entry of this order.

Dated: September 14, 2020

SHARON JOHNSON COLEMAN

U.S. District Court Judge

SCHEDULE A

No.	Defendant Name / Alias
1	2015honestmerchants
2	2016bettergoods
3	7color7
4	actplus
5	amazingstore66
6	beautiful-estore
7	bsalexj02
8	buyinbox
9	candy-sell
10	chrisshopzoe
11	dd12012
12	echemfashionn
13	emobilehome
14	greatdealmalls
15	happy-shopping2011
16	homeshop_2020
17	jaipurkalakendra
18	kendycocoshop
19	lilyyangstore
20	liubeauy9
21	mountain2113
22	mr.fadela
23	patapom
24	pre-top
25	prettyfairy0006
26	qiuxioo
27	rainbowgirl188
28	rollingsky
29	sankbest
30	shsnas_999
31	skywin16
32	smartove
33	sohunew2013
34	studytow98
35	suki_design
36	suzhouchuandu_2016
37	sweehealth
38	theonlysuper

20	,
39	vanessasatop
40	wherehaveyou
41	xupeiclothl
42	yan8926
43	yaweijide
44	yettasheila
45	ynpixel88
46	br925silverczjewelry
47	c_enjoybuying
48	comelyonlineshopping
49	dailydeal*2013
50	divya-jewels
51	edensurfing
52	famous8800
53	glass-world
54	halobrother
55	historymj
56	jewelry-base
57	jianjianstore
58	julyinsun
59	kimingjewelry
60	lr8951102
61	lyly0304
62	mybaifenbai2012
63	qingwezho-0
64	raj_jewels
65	rebirths88
66	shippingtime007
67	soyoung54
68	super_deal321
69	syt-fashion
70	topitem-rinhoo
71	yushishop2008
72	10happyendonline
73	joytownonline
74	alipapastore
75	amusingvogue
76	angelapretty
77	bagbok
78	beautifulgirlshop
79	beautybuilding

80	brilliantly-illuminated
81	callingevan
82	cartonstory
83	cherrymayly
84	cherrysuper
85	darangelica
86	ecoobuy
87	fashionvoguee
88	idscharar
89	pashaluck
90	sunrise1688
91	tinaforyou
92	veevan.vision
93	wonderfulbuying36588
94	97k-toprated
95	anketion
96	bag-ywbt
97	beluckyforall
98	big-deal365
99	cypressin
100	diybead
101	endingcolor
102	fashion_onlines
103	greentree199
104	jewelry-wholesaler
105	land_wind
106	life-with-you
107	love_wholesale
108	lucky_jewelry
109	seasofbeauty
110	shan901
111	sun-jewellry
112	upforbest
113	wshop2012
114	682588*11
115	bigtreeonline
116	chyf00000
117	dangoyoung06
118	dvm_store
119	ebnhddwlhnss72-7
120	extraps

101	Cot many
121	fat-mango
122	happysmile336
123	hkxr86742
124	ilinkme
125	jdcom1387
126	litangtouzi
127	mariocostume
128	nokabar
129	phoenix1900
130	th-trade
131	tomasocostume
132	wzhongqi2017-7
133	babala1688
134	daily_needs
135	dragon-store2012
136	electronic.wholesale365
137	home-garden-guru
138	jolwnwbl1
139	lessfash
140	lycheejewelry
141	macpart999
142	mingzhe456
143	pfkn-59
144	radanyaart
145	springraining5
146	tihbwowi_2
147	woman_home
148	yanmiazhan0
149	yin.production
150	cnywlujianping2008
151	dailywarecenter
152	fashionspro
153	insideyourstyle
154	jewelry_supplier
155	jewelry998
156	niubi11
157	pendanthollywood
158	smilelightly
159	stylishmoment
160	tattoofromchina
161	top_hope

162	wonderfulmall
163	15oceaneshop
164	ciciela
165	crownseller
166	daiwei0070755
167	fashion-dress95
168	hiclient
169	homesale_sky
170	seventhmall
171	value1992
172	windylegend
173	wondersonline
174	amigahome
175	beyondmall
176	floryshopping
177	golanmi
178	happynesshome
179	happyshop166
180	loverbeautycompany
181	wholesale-charm
182	ztihqy1056
183	4773399
184	anneflower301
185	bonjourjewelry2012
186	gracescharms08
187	linglshe0
188	lingyunlv01
189	maxrenn2
190	allstar-seller
191	easyshopping66
192	halishio
193	larksing
194	minikshop
195	ruledesign
196	wangrea
197	buy4supply
198	colinliu2013
199	guante
200	jewelry-beads
201	ourwm0012015
202	strive_8

203	johnson.adpp
204	yunt2016
205	3.9891
206	2011-mascot
207	2015justinxiao
208	4aquarius
209	97kentrepot
210	aihuangli8
211	bijouxcasa
212	cherrygirlly
213	cristina8989
214	daily-essentials
215	digital2018
216	digitalfromchina
217	e-fashion365
218	everyday-jewelry
219	excited-workhard
220	getinshop
221	gotolove5687
222	haifei-agate
223	housestorage
224	jianfanj_1
225	jumbhappy_9
226	lalang-love-diy
227	love-awayt
228	lxh688
229	mascotkingdom
230	monterey2012
231	pearlwholesale
232	sex-plaza2014
233	shengxinyide2021new
234	tita-doremi
235	us-enjoy
236	westbaysea
237	yichengmall2014

No	Defendants Online Marketplace
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https://www.ebay.com/usr/2016bettergoods https://www.ebay.com/usr/2016bettergoods https://www.ebay.com/usr/2016bettergoods https://www.ebay.com/usr/2016bettergoods https://www.ebay.com/usr/2016bettergoods https://www.ebay.com/usr/2016bettergoods https://www.ebay.com/usr/2016bettergood https://www.ebay.com/usr/balexj02 https://www.ebay.com/usr/balexj02 https://www.ebay.com/usr/balexj02 https://www.ebay.com/usr/balexj02 https://www.ebay.com/usr/buyinbox http://www.ebay.com/usr/dal2012 https://www.ebay.com/usr/dal2012 https://www.ebay.com/usr/greatdealmalls http://www.ebay.com/usr/greatdealmalls http://www.ebay.com/usr/greatdealmalls https://www.ebay.com/usr/greatdealmalls https://www.ebay.com/usr/swardove http://www.ebay.com/usr/swardove http://www.ebay.com/usr/swardove http://www.ebay.com/usr/swardove http://www.ebay.com/usr/swardove http://www.ebay.com/usr/swardove http://www.ebay.com/usr/swardove http://www.ebay	1	1,, // 1 // /20151 , 1
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141	http://www.ebay.com/usr/macpart999
142	http://stores.ebay.com/mingzhe456-stone
143	https://www.ebay.co.uk/usr/pfkn-59
144	http://www.ebay.com/usr/radanyaart
145	http://www.ebay.com/usr/springraining5
146	https://www.ebay.co.uk/usr/tihbwowi_2
147	http://stores.ebay.com/jewelery-home888
148	http://www.ebay.com/usr/yanmiazhan0
149	http://www.ebay.com/usr/yin.production
150	http://stores.ebay.com/cnywlujianping2008
151	http://www.ebay.com/usr/dailywarecenter
152	http://stores.ebay.com/fashionspro
153	http://www.ebay.com/usr/insideyourstyle
154	http://stores.ebay.com/lucky-bead88
155	https://www.ebay.com.au/usr/jewelry998
156	http://www.ebay.com/usr/niubi11
157	http://www.ebay.com/usr/pendanthollywood
158	http://www.ebay.com/usr/smilelightly
159	http://www.ebay.com/usr/stylishmoment
160	http://www.ebay.com/usr/tattoofromchina
161	http://stores.ebay.com/top-hope
162	http://stores.ebay.com/wonderfulmall
163	http://stores.ebay.com/15ALLFORKIDSSHOP
164	http://stores.ebay.com/ciciela

165	https://www.ebay.co.uk/usr/crownseller
166	http://www.ebay.com/usr/daiwei0070755
167	http://stores.ebay.com/fashion-dress95
168	https://www.ebay.com/usr/hiclient
169	http://www.ebay.com/usr/homesale_sky
170	http://www.ebay.com/usr/seventhmall
171	https://www.ebay.co.uk/usr/value1992
172	https://www.ebay.com/str/windylegend
173	http://stores.ebay.com/wondersonline
174	https://www.ebay.co.uk/usr/amigahome
175	http://stores.ebay.com/beyondmall
176	http://www.ebay.com/usr/floryshopping
177	https://www.ebay.com.au/usr/golanmi
178	https://www.ebay.co.uk/usr/happynesshome
179	http://www.ebay.com/usr/happyshop166
180	http://stores.ebay.com/Loverbeautycompany
181	http://stores.ebay.com/Wholesale-Charm
182	http://stores.ebay.com/Only1056
183	http://www.ebay.com/usr/4773399
184	http://www.ebay.com/usr/anneflower301
185	http://stores.ebay.com/bonjourjewelry2012
186	http://www.ebay.com/usr/gracescharms08
187	http://www.ebay.com/usr/linglshe0
188	http://stores.ebay.com/lingyunlv
189	http://www.ebay.com/usr/maxrenn2
190	http://stores.ebay.com/allstar-seller
191	http://stores.ebay.com/easyshopping66
192	https://www.ebay.co.uk/usr/halishio
193	https://www.ebay.co.uk/usr/larksing
194	https://www.ebay.com.au/usr/minikshop
195	http://stores.ebay.com/ruledesign
196	http://www.ebay.com/usr/wangrea
197	https://www.ebay.co.uk/usr/buy4supply
198	http://stores.ebay.com/Keep-Here
199	http://www.ebay.com/usr/guantc
200	http://www.ebay.com/usr/jewelry-beads
201	http://www.ebay.com/usr/ourwm0012015
202	http://www.ebay.com/usr/strive_8
203	http://www.ebay.com/usr/johnson.adpp
204	http://www.ebay.com/usr/yunt2016
205	http://stores.ebay.com/3-98910BUS

206	http://stores.ebay.com/2011-mascot
207	http://www.ebay.com/usr/2015justinxiao
208	https://www.ebay.co.uk/usr/4aquarius
209	https://www.ebay.com.au/usr/97kentrepot
210	http://stores.ebay.com/aihuangli8
211	https://www.ebay.com.au/usr/bijouxcasa
212	https://www.ebay.co.uk/usr/cherrygirlly
213	https://www.ebay.co.uk/usr/cristina8989
214	https://www.ebay.co.uk/usr/daily-essentials
215	http://stores.ebay.com/Digital-2018
216	http://stores.ebay.com/digitalfromchina
217	http://stores.ebay.com/e-fashion365
218	http://stores.ebay.com/Everyday-jewelry
219	https://www.ebay.com.au/usr/excited-workhard
220	https://www.ebay.co.uk/usr/getinshop
221	https://www.ebay.com.au/usr/gotolove5687
222	http://www.ebay.com/usr/haifei-agate
223	https://www.ebay.co.uk/usr/housestorage
224	http://www.ebay.com/usr/jianfanj_1
225	http://www.ebay.com/usr/jumbhappy_9
226	https://www.ebay.com/str/lalanglovediy
227	https://www.ebay.co.uk/usr/love-awayt
228	http://www.ebay.com/usr/lxh688
229	http://stores.ebay.com/mascotkingdom
230	http://stores.ebay.com/monterey2012
231	http://stores.ebay.com/pearlwholesale
232	https://www.ebay.com/usr/sex-plaza2014
233	https://www.ebay.com.au/usr/shengxinyide2021new
234	http://stores.ebay.com/tita-doremi
235	http://stores.ebay.com/us-enjoy
236	https://www.ebay.co.uk/usr/westbaysea
237	https://www.ebay.com/usr/yichengmall2014